

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3: 23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

DECLARATION OF DAVID KOKAKIS

I, David Kokakis, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am Chief Counsel at Universal Music Publishing Group (“UMPG”). I have served in this role since 2018. In my capacity as Chief Counsel for UMPG, I manage the entire legal function, including all songwriter contract negotiations, music publishing catalog acquisitions, and other matters, for UMPG and its affiliated publishing entities. I also oversee UMPG’s copyright department.

2. I submit this declaration on behalf of Plaintiffs Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., and Universal Music – Z Tunes LLC (collectively, the “UMPG Plaintiffs”) in support of Plaintiffs’ Brief in Opposition to Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, in the Alternative, to Transfer Venue.

3. I have knowledge of the facts stated herein based on personal knowledge through my employment with UMPG, as well as my review of the documents and websites referenced in

this declaration. If called as a witness, I could and would testify competently to the information contained herein.

UMPG'S OPERATIONS

4. The UMPG Plaintiffs are leading music publishing companies that collectively comprise UMPG, one of the largest music publishing entities in the world. The UMPG Plaintiffs are each part of Universal Music Publishing Group, and all are ultimately owned by Universal Music Group N.V.

5. The UMPG Plaintiffs own and/or control exclusive rights with respect to an award-winning catalog of copyrighted musical compositions. These copyright interests are among UMPG's primary assets and at the core of its business, including operations based out of Tennessee and elsewhere.

6. As Chief Counsel at UMPG, I am generally familiar with the location of UMPG's offices and distribution of its employees nationally. Tennessee is home to UMPG's worldwide administration headquarters, located in Franklin, Tennessee. UMPG employs 279 employees in the United States, including 79 employees at its Franklin, Tennessee offices and 12 employees at its Nashville, Tennessee offices. UMPG has no offices in San Francisco, California.

ABILITY TO TESTIFY

7. If this lawsuit is transferred it will impose a significant financial burden on UMPG.

8. If UMPG employees based in Franklin or Nashville are required to travel to San Francisco in connection with this lawsuit, the UMPG Plaintiffs will incur expenses and inconvenience they would otherwise not incur if the case remains in Tennessee.

9. Additionally, while various UMPG employees based elsewhere frequently travel to UMPG's offices in Tennessee in the course of their duties, UMPG has no significant operations in


San Francisco. Employee travel to the Northern District of California, where UMPG has no office, would meaningfully disrupt UMPG employees' performance of their ordinary job responsibilities.

UMPG'S TENNESSEE-BASED SONGWRITERS

10. As leading music publishers, the UMPG Plaintiffs represent and advocate on behalf of iconic songwriters, exerting great efforts to protect their rights and artistic vision and ensuring proper remuneration for exploitation of their works.

11. UMPG represents songwriters from across the nation and globally, including dozens of songwriters based in Tennessee, such as Kenny Chesney, Luke Combs, Carter Faith, Greytan James, and Keith Urban. UMPG also organizes various events for its songwriters, including a week-long "writing camp" for songwriters hosted in Nashville. UMPG also regularly hosts songwriters in its Nashville offices, where writers may compose songs in the offices' writing rooms and record demos in the in-house studio.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.


David Kokakis

Executed this 22ND  day of January, 2024 in Los Angeles, California.

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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